

Ashley Marucci

From: Sharon Houston <shouston@lawpga.com>
Sent: Tuesday, June 21, 2016 7:50 PM
To: Ashley Marucci
Cc: Patti Kasputys; Harry Roth (HRoth@cprlaw.com); Michael Coren (mcoren@cprlaw.com); Debora Trotz; Kelly L. Lozoskie
Subject: FW: Box Hill Cases -- Barbara Wagner Deposition
Attachments: Angelos 2.pdf

Hello Ashley,

We have reviewed your letter regarding a discovery dispute as to the scope of topics and document production in the Amended Notice of Deposition directed to Barbara Wagner.

We believe all the topics listed in Attachment A are relevant and have probative value as to the issues involved in the *Box Hill* cases.

Of note, the MDL Court has permitted (over Plaintiffs' objections) *Box Hill* and other clinics to serve Notices of Deposition by Written Questions upon other clinics regarding their purchases of NECC MPA.

Please be advised, in view of the Court's rulings on the analogous Notices of Deposition by Written Questions we intend to proceed as noticed and subpoenaed.

Regards,
Sharon

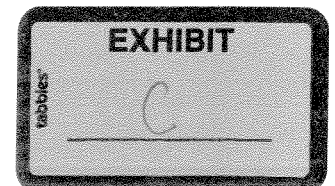
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From: Ashley Marucci [<mailto:marucci@ewmd.com>]
Sent: Monday, June 20, 2016 5:12 PM
To: Sharon Houston
Subject: Box Hill Cases -- Barbara Wagner Deposition

Sharon,

Attached is a letter regarding Barbara Wagner's fact witness deposition in the *Box Hill* cases.

Best,
Ashley



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